

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

-v-

ANDREY KOSTIN et al.,

Defendants.

Case No. 1:24-cr-00091 (GHW)

**DECLARATION OF DAVID C.  
RYBICKI**

DAVID C. RYBICKI hereby declares:

1. I am a partner of the firm K&L Gates LLP and am counsel for Defendant Vadim Wolfson in the above-captioned matter.

2. I am a member in good standing of the Bar of the District of Columbia and the Bar of California and am admitted *Pro Hac Vice* to practice before this Court. I make this declaration in support of Defendant Vadim Wolfson's Motion to Modify Filter Team Procedures and for Injunction Against Release or Review of Records Pending Ruling.

3. Pursuant to Local Criminal Rule 16.1, I certify that counsel for Defendant Vadim Wolfson has conferred with opposing counsel in an effort in good faith to resolve by agreement the issues raised by the motion without the intervention of the Court and has been unable to reach an agreement.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 16th day of April, 2024 in Washington, DC.

/s/David C. Rybicki  
David C. Rybicki